

CC Docket No. 94-102 – Status Report

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Date: May 1, 2009

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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STATUS REPORT
May, 2009
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Keystone Wireless, LLC ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, Order, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, LLC – FRN 0007 4157 06

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Information Regarding PSAPs:

As previously reported, Keystone has received Phase I and/or Phase II requests from all nine of the PSAPs in its market, and has installed its Phase I deployments in all nine counties in its market. All of the Phase I installations in Keystone's market are using NCAS solutions with Intrado as the central hub, which is a requirement for moving to the Phase II E-911 deployment.

Keystone is continuing to maintain regular contact with the nine in-market PSAPs and the State of Pennsylvania, and is providing them with any new information on the status of Keystone's Phase II E-911 deployment. Neither the Pennsylvania Emergency Management Agency ("PEMA"), the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, nor any PSAP has expressed any concerns or issues with respect to Keystone's Phase II E-911 implementation efforts.

Keystone is cooperating with PEMA regarding its Wireless 9-1-1 Cost Recovery Plan ("CRP"). As previously reported, Keystone's CRP was initially submitted to PEMA in March of 2007. The CRP was revised in November of 2007 (CRP 2007/2008) and in March of 2008 (CRP 2008/2009). PEMA granted partial approval of Keystone's CRP 2008/2009. However, PEMA has informed Keystone that the approved funds would not be available to wireless carriers in that fiscal year because all funds had been committed to PSAPs. As a result, funding from PEMA will depend on the availability of funds in fiscal year 2009/2010. Keystone timely filed an update of the CRP 2008/2009 (the CRP 2009/2010 report and request for funds) prior to the March 1, 2009 deadline. It is expected that funding decisions by PEMA will not occur until approximately June 2009.

Keystone continues to explore other E911 funding sources. However, Keystone has not had success in securing alternative funding. Keystone will continue to remain in contact with PEMA, and will be keeping the in-market PSAPs updated on the status of the PEMA funding for Keystone's Phase II deployment.

Implementation of Phase II Service:

As previously reported, Keystone has been working with Polaris Wireless to design a network-based Phase II solution for its market. Keystone has initiated contract negotiations with Polaris Wireless, but final negotiations on this contract are pending receipt of a funding commitment from PEMA (as described above) or from some other source for Keystone's Phase II deployment. Once Keystone receives a funding commitment of funds and executes a definitive agreement with a Phase II manufacturer, Keystone will be able to conduct a final market study to determine the exact Phase II solution to be deployed in Keystone's market. Keystone hopes to commence Phase II deployment late in the fourth quarter of 2009, at the earliest.

Keystone expects to meet the Commission's E911 accuracy requirements in the core population areas of its market, as prescribed by Sections 20.18(h)(1) or (2) of the Commission's Rules. However, Keystone will not achieve the requisite 67% and 95% accuracy requirements at the PSAP level in all parts of the licensed area, even when Keystone implements the network-based Phase II E-911 solution. This is because triangulation techniques are viable in only a portion of Keystone's service area, in light of the very rural and sparsely populated nature of the market and the distance between Keystone's cell sites. Hence, Keystone likely will be required to seek a waiver of these accuracy standards from the Commission so that it can continue to operate below the accuracy standards until such time as there are further technological advancements in this field.

Construction of New Cells and Expansion of Coverage:

Keystone reported in its February 2009 Status Report that it was in the process of constructing a new cell site and that completion was anticipated in the first quarter of 2009. Due to unforeseen circumstances, Keystone expects to complete construction of the new cell site in the third quarter of 2009. Keystone does not have any plans to construct any more new cell sites in its market in the immediate future.